

Mr. Scott Darling  
ALCOA Inc. – Warrick Operations  
P.O. Box 10  
Newburgh, Indiana 47629-0010

Re: 173-12588  
Second Minor Permit Modification to  
Minor Source Modification No.:173-10959-00007

Dear Mr. Darling:

ALCOA Inc. – Warrick Operations was issued a source modification 173-10959 on July 15, 1999 for the construction and operation of an aluminum shredder/baler. A First Minor Permit Modification 173-11419 was issued on June 9, 2000 to add Secondary Aluminum Processing NESHAP (40 CFR 63, Subpart RRR) language for the bag leak detection system. On August 9, 2000, ALCOA Inc. – Warrick Operations submitted a letter and stack test results that support the removal of all permit conditions requiring a baghouse, since the aluminum shredder can comply with the 0.01 gr/dscf when operating uncontrolled at a maximum capacity of 25,000 lb/hr. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved.

The modification consists of the following changes:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) aluminum shredder/bailer, with a maximum capacity of **25,000** ~~30,000~~ pounds per hour, ~~equipped with a baghouse to control particulate matter emissions~~ and exhausting to stack 134-90.

The following condition was removed from the permit, because the source is removing the air pollution control equipment that would be regulated by this rule:

~~C.5 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation, except as otherwise stated in this permit.~~

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

One (1) aluminum shredder/bailer, with a maximum capacity of **25,000** ~~30,000~~ pounds per hour, ~~equipped with a baghouse to control particulate matter emissions~~ exhausting to stack 134-90.

*The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.*

The following changes to the Emissions and Standards section of this approval have been made to specify the requirements of 40 CFR 63, Subpart RRR:

**D.1.1 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]**  
**The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart RRR (Secondary Aluminum Production).**

**D.1.2 Secondary Aluminum Production NESHAP [40 CFR 63, Subpart RRR]**

**Pursuant to 40 CFR 63, Subpart RRR, the Permittee shall not discharge or cause to be discharged to the atmosphere particulate matter (PM) emissions in excess of 0.01 grains per dry standard cubic foot (gr/dscf).**

The following condition was added to the Emissions and Standards section of this approval to require the aluminum shredder to operate at the throughput tested as the maximum throughput:

**D.1.5 Emissions Limitations**

**The aluminum shredder/baler shall not operate at a throughput of greater than 25,000 pounds per hour. Compliance with this limit satisfies the requirements of Condition D.1.2 (40 CFR 63, Subpart RRR).**

**Compliance Determination Requirements**

The following condition was deleted due to updated language used by the IDEM, OAM:

~~D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.~~

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.6 Compliance Requirements [326 IAC 2-1.1-11]**

**The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.**

The following condition was deleted, because the baghouse will not be operating.

~~D.1.5 Particulate Matter (PM)~~

~~The baghouse for PM control shall be in operation and control emissions from the aluminum shredder at all times that the aluminum shredder is in operation.~~

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

The following condition was deleted, based on testing that proves the baghouse is not needed to comply with the 40 CFR 63, Subpart RRR requirement specified in Condition D.1.2:

~~D.1.6 Bag Leak Detection~~

~~The facility must install and operate a bag leak detection system. Upon installation of a triboelectric bag leak detection system, the Permittee must operate the detection system pursuant to U.S. EPA guidance entitled Fabric Filter Bag Leak Detection Guidance (dated 1997 September). This document is available from the US EPA, Office of Air Quality Planning and Standards, Monitoring and Analysis Division, Emissions Measurement Center (MD-18), Research Triangle Park, NC 27711. Other bag leak detection systems must be installed, operated, calibrated and maintained in accordance with the manufacturers written specifications.~~

~~If the bag leak detection system is inoperable, the facility shall conduct visible emission notations according to the following procedures, until the bag leak detection system is operable:~~

- ~~(a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shutdown time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) At startup of the process, an employee shall be considered trained if he has received instruction on the operation of the source and the control equipment. After one month of operation of the process, an employee shall be considered a trained employee if the employee has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

The following condition was added as a compliance monitoring condition to assure compliance with applicable limitations and the ensure measures are taken when "abnormal" emissions are detected:

#### **D.1.7 Visible Emissions Notations**

- (a) Visible emission notations of the aluminum shredder/baler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

The following condition was added pursuant to 40 CFR 63, Subpart RRR:

#### **D.1.8 Compliance Monitoring [40 CFR 63, Subpart RRR]**

**Pursuant to 40 CFR 63.1510 and Condition C.7 (Compliance Monitoring Plan – Failure to take Response Steps) of this approval, the Permittee shall submit an Operation, Maintenance and Monitoring (OM&M) Plan to the IDEM, OAM for review and approval and consist of information outlined in 40 CFR 63.1510(b)(1-8).**

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

The following changes were made to the Record Keeping and Reporting Requirements to be consistent with the newly added conditions:

#### **D.1.79 Record Keeping Requirements**

- ~~(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of the bag leak detection system output, or, as appropriate, of the daily visible emission notations of the baghouse stack exhaust.~~
- ~~(b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
  - ~~(1) Documentation of all response steps implemented, per event; and~~
  - ~~(2) Operator standard operating procedures (SOP).~~~~
- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of the visible emission notations of the aluminum shredder/baler stack exhaust.**
- (b) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records of throughput to the aluminum shredder/baler.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**D.1.10 Reporting Requirements [40 CFR 63.1516]**

**Pursuant to 40 CFR 63, Subpart RRR, a semi-annual summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within sixty (60) days after the end of the six (6) month period being reported. The report submitted by the Permittee does not require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).**

All other conditions of the permit shall remain unchanged and in effect. The entire approval has been printed for a clear copy of the approval for convenience in referencing.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Kimberly Titzer, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-8396), or dial (317) 233-8396.

Sincerely,  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

**Attachments**

kt

cc: File – Warrick County  
U.S. EPA, Region V  
Warrick County Health Department  
Regional Office – Southwest Regional Office  
Air Compliance Section Inspector – Richard Sekula  
Compliance Data Section – Karen Nowak  
Administrative and Development – Janet Mobley  
Technical Support and Modeling – Michele Boner  
Title V Permit File: 173-6627-00007

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

## **ALCOA, Inc. - Warrick Operations Junction State Routes 66 and 61 Newburgh, Indiana 47629-0010**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 173-10959-00007	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:  July 15, 1999
First Minor Permit Modification No.: 173-11419, issued June 9, 2000	
Second Minor Permit Modification No.: 173-12588      revised pages: 3, 11 and 12	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## TABLE OF CONTENTS

### **A SOURCE SUMMARY**

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

### **B GENERAL CONSTRUCTION CONDITIONS**

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

### **C GENERAL OPERATION CONDITIONS**

- C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
- C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- C.4 Opacity [326 IAC 5-1]
- C.5 Performance Testing [326 IAC 3-6]
- C.6 Compliance Requirements [326 IAC 2-1.1-11]
- C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.8 Compliance Monitoring Plan - Failure to Take Response Steps
- C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
- C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

### **D.1 FACILITY OPERATION CONDITIONS - Aluminum Shredder**

#### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]
- D.1.2 Secondary Aluminum Production NESHAP [40 CFR 63, Subpart RRR]
- D.1.3 Particulate Matter [326 IAC 6-3-2]
- D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.5 Emissions Limitations
- D.1.6 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.7 Visible Emissions Notations
- D.1.8 Compliance Monitoring [40 CFR 63, Subpart RRR]

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements [40 CFR 63, Subpart RRR]

### **Certification**

### **Semi-Annual Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a stationary aluminum manufacturing plant.

Responsible Official: Mr. Melvin W. Lager, Jr.  
Source Address: Junction State Routes 66 and 61, Newburgh, Indiana 47629-0010  
Mailing Address: P.O. Box 10, Newburgh, Indiana 47629-0010  
Phone Number: 812-853-6111  
SIC Code: 3334, 3352  
County Location: Warrick  
County Status: Attainment for all criteria pollutants, except Unclassifiable for Sulfur Dioxide (SO<sub>2</sub>)  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) aluminum shredder/baler, with a maximum capacity of 25,000 pounds per hour, and exhausting to stack 134-90.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

---

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

---

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

---

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

---

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.



## SECTION C

## GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

---

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

---

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP-s shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### Testing Requirements [326 IAC 2-7-6(1)]

##### C.5 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM. A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

##### C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

##### C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can either be an entirely new document, consisting in whole of information contained in other documents, or consisting of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates, by reference, information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan, the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) An Operation, Maintenance & Monitoring Plan pursuant to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within Anormal® parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
- (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

The documents submitted pursuant to this condition do not require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All data, electronic or otherwise, for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) aluminum shredder/baler, with a maximum capacity of 25,000 pounds per hour, and exhausting to stack 134-90.

*The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.*

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart RRR (Secondary Aluminum Production).

#### D.1.2 Secondary Aluminum Production NESHAP [40 CFR 63, Subpart RRR]

Pursuant to 40 CFR 63, Subpart RRR, the Permittee shall not discharge or cause to be discharged to the atmosphere particulate matter (PM) emissions in excess of 0.01 grains per dry standard cubic foot (gr/dscf).

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3]

The particulate matter (PM) from the aluminum shredder shall be limited to less than 22.27 pounds per hour when operating at a process weight rate of 12.5 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The emissions from the aluminum shredder shall be limited to 24.0 tons of PM and 14.0 tons of PM<sub>10</sub>. This limit is required to limit the potential to emit of PM<sub>10</sub> to less than 25 tons of PM and 15 tons of PM<sub>10</sub> per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.1.5 Emissions Limitations

The aluminum shredder/baler shall not operate at a throughput of greater than 25,000 pounds per hour. Compliance with this limit satisfies the requirements of Condition D.1.2 (40 CFR 63, Subpart RRR).

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the aluminum shredder/baler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the

atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

**D.1.8 Compliance Monitoring [40 CFR 63, Subpart RRR]**

Pursuant to 40 CFR 63.1510 and Condition C.7 (Compliance Monitoring Plan – Failure to take Response Steps) of this approval, the Permittee shall submit an Operation, Maintenance and Monitoring (OM&M) Plan to the IDEM, OAM for review and approval and consist of information outlined in 40 CFR 63.1510(b)(1-8).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of the visible emission notations of the aluminum shredder/baler stack exhaust.
- (b) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records of throughput to the aluminum shredder/baler.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.10 Reporting Requirements [40 CFR 63.1516]**

Pursuant to 40 CFR 63, Subpart RRR, a semi-annual summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within sixty (60) days after the end of the six (6) month period being reported. The report submitted by the Permittee does not require the certification by the Aresponsible official as defined by 326 IAC 2-7-1(34).



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: ALCOA, Inc. - Warrick Operations  
Source Address: Junction State Routes 66 and 61, Newburgh, Indiana 47629-0010  
Mailing Address: P.O. Box 10, Newburgh, Indiana 47629-0010  
Source Modification No.: T173-10959-00007

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: ALCOA, Inc. - Warrick Operations  
Source Address: Junction State Routes 66 and 61, Newburgh, Indiana 47629-0010  
Mailing Address: P.O. Box 10, Newburgh, Indiana 47629-0010  
Source Modification No.: T173-10959-00007

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked **NO deviations occurred this reporting period**.

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.